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BEFORE THE  
SURFACE TRANSPORTATION BOARD

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NORTH AMERICA FREIGHT CAR ASSOCIATION

v.

UNION PACIFIC RAILROAD COMPANY

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UNOPPOSED MOTION TO ALTER PROCEDURAL SCHEDULE

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Dated: September 14, 2011

On August 2, 2011, the Board issued a Decision adopting a procedural schedule proposed jointly by the parties.

Since that date, which provided that discovery was to begin on July 18 and end on September 16, 2011, each party has served written interrogatories and document requests on the other, and each party has served its objections and partial responses on the other.

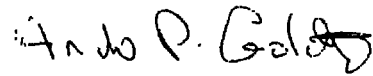
After numerous consultations between the parties, it is now clear that the volume of information sought by Union Pacific Railroad ("UP") from North America Freight Car Association ("NAFCA") will require responses from some 16 NAFCA members, with information requested by UP in great detail. NAFCA and UP will discuss this issue next week, but it is clear that NAFCA will have difficulty in meeting the existing schedule.

Accordingly, NAFCA, with the concurrence of UP, seeks the substitution of the following schedule for the schedule adopted by the Board on August 2, 2011.

October 3, 2011	UP completes discovery responses
November 4, 2011	NAFCA completes discovery responses
December 5, 2011	NAFCA opening statement due
February 3, 2012	UP reply statement due
March 5, 2012	NAFCA rebuttal statement due

The parties respectfully urge the Board to adopt the proposed schedule.

Respectfully submitted,



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